

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

SKF USA, INC.

VS.

**ELECTRIC MOTOR BEARING
SUPPLY, INC.**

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NO. 1:10-cv- 00640- MAC

**DEFENDANT'S ORIGINAL ANSWER TO
PLAINTIFF'S ORIGINAL COMPLAINT**

TO THE HONORABLE JUDGE OF SAID COURT:

DEFENDANT **ELECTRIC MOTOR BEARING SUPPLY, INC.** in answer to Plaintiff's Original Complaint shows unto the Court the following:

Subject to all defenses set forth hereinafter, Defendant responds based upon its current knowledge, information and belief, to the specific allegations of the Plaintiff's Original Complaint as set forth below. Responses are numbered in accordance with the same paragraph numbers in the Plaintiff's Original Complaint. Any allegation not expressly admitted is hereby denied; no implied admissions are made or intended. Furthermore, Defendant expressly reserves the right to add, delete or otherwise amend its response as discovery proceeds in this case.

BACKGROUND

1. Defendant admits that this lawsuit is brought pursuant to the laws listed in Paragraph 1 of Plaintiff's Complaint; however, Defendant denies that the Plaintiff is entitled to any relief under these laws and demands strict proof thereof. Otherwise, Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

2. Defendant admits this court has subject matter jurisdiction. Otherwise, Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

3. Admit.

4. Admit

PARTIES

5. Upon information and belief, admitted.

6. Admitted.

ALLEGATIONS

7. Upon information and belief, admitted.

8. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

9. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

10. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

11. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

12. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

13. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

14. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

thereof.

15. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.
16. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.
17. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.
18. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.
19. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.
20. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.
21. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.
22. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.
23. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.
24. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

25. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

COUNT I

26. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.
27. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.
28. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.
29. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

COUNT II

30. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.
31. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.
32. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.
33. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.
34. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

35. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

36. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

37. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

COUNT III

38. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

39. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

40. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

41. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

COUNT IV

42. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

43. Defendant denies the allegations contained in this paragraph and demands strict proof thereof

44. Defendant denies the allegations contained in this paragraph and demands strict proof thereof.

PRAYER

The PRAYER Paragraphs of Plaintiff's Complaint do not require a response; however, to the extent that one is deemed required, Defendant denies the material allegations of that Paragraph and demands strict proof thereof.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that Plaintiff's claims be in all things denied, for attorney's fees and costs of suit, and for such other and further relief to which it may be justly entitled

Respectfully submitted,

Seale, Stover & Bisbey

By: S/ Scott W. Stover
Scott W. Stover
Attorney-in-Charge
Texas Bar No. 19349400
P.O. Box 480
Jasper, Texas 75951
Tel. (409)384-3463
Fax. (409)384-3017

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing document has been served upon all parties of record by use of the Court's Electronic Filing System, on this 18th day of Nov., 2010.

S/Scott W. Stover
Attorney for Defendant